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*Attorneys for Defendants GORDON CLARK,  
RODNEY KOCH, CINDY LOU ELLEN KOCH,  
and KRYSTAL LEE CLARK*

**IN THE UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

LUCKY LAKE FARM & WATER LIMITED  
PARTNERSHIP, a Saskatchewan Limited  
Partnership; and SWIFT RIVER FARMS  
LTD., an Alberta corporation;

Plaintiffs,

vs.

GORDON CLARK, an individual; RODNEY  
KOCH A/K/A GORDON CLARK, an  
individual; CINDY LOU ELLEN KOCH, an  
individual; KRYSTAL LEE CLARK, an  
individual; MICHAEL ROSE, an individual;  
MICHAEL ROSE & ASSOCIATES  
STRATEGIC CONSULTING INC., a Nova  
Scotia corporation; JEFF HOUGHTON, an  
individual; TW INTERNATIONAL  
INVESTMENTS LTD., a Bahamian  
Registered company; TW ADVISORS LTD.,  
a British Virgin Islands registered company;  
TW FUNDS INC., a British Virgin Islands  
registered company; LA BELLA VITA  
EQUESTRIANS LLC, a Nevada limited liability  
company; LA BELLA VITA  
INTERNATIONAL EQUINE SALES LLC, a  
Nevada limited-liability company; LIQUID  
LUXURY GROUP LLC, a Nevada limited  
liability company; BLACKSTONE LUXURY  
GROUP LLC, a Nevada limited liability  
company; DOES I-XX, inclusive; and ROE  
CORPORATIONS, I-X, inclusive,

Defendants.

Case No.: 2:23-cv-01768-GMN-VCF

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME FOR  
DEFENDANTS GORDON CLARK,  
RODNEY KOCH, CINDY LOU ELLEN  
KOCH, AND KRYSTAL LEE CLARK  
TO FILE ANSWER TO FIRST  
AMENDED COMPLAINT**

Plaintiffs and Defendants Gordon Clark, Rodney Koch, Cindy Lou Koch, and Krystal Lee Clark, by and through their respective counsel, hereby stipulate and agree to an Order to extend the deadline for Defendants Gordon Clark, Rodney Koch, Cindy Lou Koch, and Krystal Lee Clark to file their responsive pleading to Plaintiffs' First Amended Complaint (ECF 30) from December 19, 2023, to January 9, 2024. This is the first request for such an extension, and it is made as follows:

1. On December 5, 2023, Plaintiffs filed their First Amended Complaint (ECF 30). The deadline for Defendants Gordon Clark, Rodney Koch, Cindy Lou Koch, and Krystal Lee Clark to respond is December 19, 2023.

2. The parties are engaged in settlement discussions and therefore agree to this brief extension. This request is made in good faith and for good cause and not for any purpose of delay or harm.

NOW THEREFORE, the Parties hereby stipulate to the entry of an order extending the deadline for Defendants Gordon Clark, Rodney Koch, Cindy Lou Koch, and Krystal Lee Clark to file their responsive pleading to Plaintiffs' First Amended Complaint (ECF 30) from December 19, 2023, to January 9, 2024.

Dated this 19<sup>th</sup> day of December, 2023.

**ALDRICH LAW FIRM, LTD.**

/s/ John P. Aldrich  
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RODNEY KOCH, CINDY LOU ELLEN  
KOCH, and KRYSTAL LEE CLARK*

Dated this 19<sup>th</sup> day of December, 2023.

**FLYNN GIUDICI, PLLC**

/s/ Shamus S. Flynn  
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*Attorneys for Plaintiffs*

**ORDER**

**IT IS SO ORDERED.**



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CAM FERENBACH,  
US MAGISTRATE JUDGE

DATED: December 20, 2023